

# Policy: modern slavery

March 2021

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This policy sets out the policy on combatting forced labour in all **Four** group companies and in our supply chain. The term forced labour used in this policy includes slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

Four group companies includes FCG Worldwide Limited, Four Communications Group Limited, Four Communications Limited, Four Marketing & Media Limited, Four Colman Getty Limited, Consolidated PR Limited, Four MSA Limited (trading as Four Health Media), Four Broadgate Mainland Limited (trading as Four Broadgate), Four Cymru FBA Limited (trading as Four Cymru), Four Health Communications Limited, Four Rain Limited (trading as Four Brand), Insight Public Affairs Limited (trading as Four Public Affairs), and Legend Engage Limited (trading as Four Engage).

We have adopted this policy as part our larger commitment to encourage ethical, social and environmental responsibility, which includes the Ethical, social and CSR Policy.

We oppose the use and exploitation of forced labour and we expect all those who work for us or on our behalf to share our zero-tolerance approach.

This policy applies to all those who work for us and those who work on our behalf, including employees, agency workers, casual and freelance staff.

## Why combatting forced labour matters

1. Forced labour is a global problem. It affects over 20 million people around the world. Taking steps to tackle forced labour protects vulnerable workers and helps prevent human rights violations.
2. We do not tolerate forced labour within our business. Eradicating forced labour is consistent with our ethical principles and is important to protect our reputation, sustain investor and consumer confidence and secure our commercial position.

## Our responsibilities

1. The Board of Directors is responsible overall for ensuring that this policy and our annual slavery and human trafficking statement (see below) comply with our legal and ethical duties.
2. The Ethics Officer, Nan Williams, has day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, answering queries on it and auditing internal processes aimed at ensuring that forced labour is not taking place in our business or our supply chains. The Ethics Officer is also responsible for preparing the annual statement and presenting it to the Board for approval.
3. The Modern Slavery Act 2015 requires commercial organisations over a certain size to publish a slavery and human trafficking statement each financial year, disclosing the steps an organisation has taken to ensure that slavery and human trafficking is not taking place in its supply chain or its business. Our statement is attached as Appendix 2 and is also

published on the Legal page of our website and should be read in conjunction with this policy.

## **What we are doing**

1. We are confident that we employ no forced labour directly within our business. However, we regularly review that and also assess our supply chain with a view to ensuring that there is no use of forced labour within the supply chain.
2. We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:
  - a) We have established a Supplier Code of Conduct with which we will expect our suppliers to comply with. We may impose contractual obligations requiring compliance. This is attached as appendix 1.
  - b) We will review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we will take appropriate steps to address it
  - c) We will consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.
3. We will train personnel working with our supply chain on forced labour and the Supplier Code of Conduct, with a view to reducing the risks of forced labour in our supply chain.

## **Employee responsibilities**

1. Managers are responsible for ensuring that this policy is applied within their area of responsibility.
2. Our employees are expected to be alert to any indicators of forced labour in our business or supply chain.
3. We do not tolerate any forced labour within our business. If you suspect that there has been a breach of this policy or if you have any concerns regarding the issue of forced labour in any part of our business or our supply chain, you should notify your manager/or Nan (the Ethics Officer) or report it in accordance with our Whistleblowing policy as soon as possible.

## **Monitoring our effectiveness**

1. We will review this policy to ensure that it is operating effectively. Where concerns have been raised through this policy, we will consider how they have been handled and if appropriate follow up action has been taken.

## **Status of this policy**

1. This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by us at any time.

## Appendix 1

### SUPPLIER CODE OF CONDUCT

#### FORCED LABOUR

Four Communications Group Limited opposes the use and exploitation of forced labour. We expect all those who work for us or on our behalf to share our zero-tolerance approach.

References in this Code to “forced labour” include slavery, servitude and any type of forced or compulsory labour as well as trafficking for the purposes of exploitation.

Accordingly, our expectations of suppliers are as follows:

1. Suppliers must not use forced labour.
2. If requested by us, suppliers will complete a self-assessment questionnaire provided by us regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. Suppliers will provide us with a copy of the completed questionnaire.
3. Suppliers will allow us to audit compliance with this Code by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation and personnel.
4. If we identify any non-compliance, suppliers must prepare, permit us to review and execute an improvement plan approved by us to rectify matters.
5. Suppliers will place similar expectations to those set out above on their own suppliers.

We may require compliance with this Code of Conduct in our contracts with suppliers and may also require that they impose equivalent obligations on their own suppliers.

Subject to any contractual terms, we may terminate our supply relationship if a supplier fails to comply with this Code of Conduct. If appropriate, we may report any breach of the Code of Conduct to the appropriate authorities.

If you have any concerns, or are aware of any suspected violations of this Code of Conduct, please notify Nan Williams immediately.

## Appendix 2

### Modern slavery statement for financial year 2021

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Four Communications Group and all group companies ('Four') have taken and are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Four has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

#### Our business

Four is an independent, integrated communications agency headquartered in London and with offices across the UK and in the Gulf. The agency was launched in 2001 and has grown to more than 350 people and income in excess of £30 million/AED 150 million. Four offers a wide range of services including public relations, public affairs, community consultation, design & digital, advertising & marketing, sponsorship and media planning & buying. The agency works for a diverse range of private, public and third sector clients and has specialist teams in property, tourism, culture and sport among others.

#### Our high risk areas

Four's primary high risk area with regards to any kind of modern slavery is when utilising third parties that we are trusted to buy external services from on behalf of many clients. These services can include printing, photography, venue hire, catering, and transportation. We have established a Supplier Code of Conduct with which we will expect our suppliers to comply with. We may impose contractual obligations requiring compliance. We will review our supply chains annually to evaluate forced labour risk and, if a risk is identified, we will take appropriate steps to address it. We will consider the conduct of each supplier against the Supplier Code of Conduct when awarding and/or renewing business with the supplier.

#### Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Health and Safety policy. This includes ensuring the well-being and safety of all staff and individuals affected by Four's operations. Four will address all concerns and monitor all situations where work of any kind is undertaken by staff or individuals.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.